

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

DISABILITY RIGHTS NEW MEXICO, INC.,

Plaintiff,

v.

No. 1:22-CV-00954-WJ-JFR

TAFOYA LUCERO, et al.,

Defendants.

JOINT MOTION TO STAY PROCEEDINGS UNTIL JULY 3, 2023

THE PARTIES, through their undersigned counsel, respectfully request this Court stay all proceedings in this case until July 3, 2023 so the Parties can conduct negotiations in this matter. The grounds for this motion are:

1. The Parties agree to this stay of proceedings;
2. The Parties agree to a stay of ninety days from April 13, 2023 until July 3, 2023;
3. The Parties will meet, beginning in May 2023, to conduct negotiations in this matter;
4. The Parties agree that once the stay expires or is lifted, Plaintiffs may file an Unopposed Motion to Surreply to Defendant's Motion to Dismiss; and
5. The Parties seek this stay in the interest of conserving judicial resources and the resources of the parties while they conduct negotiations.

For the above-stated reasons, the parties respectfully request that the Court enter an order staying all proceedings in this case until July 3, 2023.

Respectfully submitted,

AMERICAN CIVIL LIBERTIES UNION
OF NEW MEXICO

/s/ María Martínez Sánchez

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